

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; and CARTIER INTERNATIONAL A.G., a Swiss corporation,

Plaintiffs,

V.

LI XINJUAN, an individual d/b/a Phmn9y3v, and Selling Accounts Phmn9y3v Jewelry and Miao-He; SHENZHEN XINJIANHE TECHNOLOGY CO., LTD, a Singapore limited company d/b/a Phmn9y3v; ZHU JIAN, an individual d/b/a Selling Accounts Phmn9y3v Jewelry, Amazing Jewelry You Want, Vfdnytu, and Yinji; and ZHOU FUHAN, an individual d/b/a Selling Accounts Byqone US and Byqone Network,

Defendants.

No. 2:22-cv-00840-MJP

**PLAINTIFFS' EX PARTE MOTION
TO FILE OVER-LENGTH MOTION
FOR DEFAULT JUDGMENT AND
PERMANENT INJUNCTION
AGAINST DEFENDANTS**

WITHOUT ORAL ARGUMENT

**NOTE ON MOTION CALENDAR:
SEPTEMBER 11, 2024**

Pursuant to Local Civil Rule 7(f), Plaintiffs Amazon.com, Inc., Amazon.com Services

LLC (“Amazon”), and Cartier International A.G. (“Cartier” and together with Amazon, “Plaintiffs”) request that the Court permit them to file an over-length *ex parte* motion in support of their request for an order from this Court granting default judgment and permanent injunction against Defendants Li Xinjuan, Shenzhen Xinjianhe Technology Co., Ltd, Zhu Jian, and Zhou Fuhan. Local Civil Rule 7(e)(1) provides that motions brought pursuant to Local Civil Rule

**PLAINTIFFS' EX PARTE MOTION TO
FILE OVER-LENGTH MOTION - 1
(2:22-cv-00840-MJP)**

Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1640
206.622.3150 main • 206.757.7700 fax

1 7(d)(1), including motions for default judgment where the opposing party has not appeared, are
2 limited to 2,100 words. By this request, Plaintiffs seek to file a motion containing approximately
3 6,600 additional words, for a total limit of 8,700 words.

4 Plaintiffs contend that the additional words are necessary to provide sufficient
5 explanation of the facts surrounding Defendants' sale of counterfeit Cartier products in the
6 Amazon.com store; Defendants' failure to appear or respond to discovery and subsequent
7 defaults; Defendants' established liability under each of the claims made by Plaintiffs; and
8 Plaintiffs' request for awards of statutory damages against Defendants. Plaintiffs' motion
9 provides support for theories of both direct and contributory liability.

10 Thus, the 2,100 word limit is insufficient for Plaintiffs to provide this Court with the facts
11 and authorities supporting the motion and to demonstrate Plaintiffs' need for an order allowing
12 for default judgment and permanent injunction against Defendants. For these reasons, Plaintiffs
13 seek permission to file an over-length motion to provide this Court with the full detail necessary
14 to support the order they seek.

15 DATED this 11th day of September, 2024.

16 *I certify that this memorandum contains 253 words, in compliance with the Local Civil
17 Rules.*

18 DAVIS WRIGHT TREMAINE LLP
19 Attorneys for Plaintiffs

20 s/ Scott Commerson
21 Scott Commerson, WSBA #58085
22 865 South Figueroa Street, Suite 2400
23 Los Angeles, CA 90017-2566
24 Tel: (213) 663-6800
25 Fax: (213) 633-6899
26 Email: scottcommerson@dwt.com

27 Lauren Rainwater, WSBA #43625
28 920 Fifth Avenue, Suite 3300
29 Seattle, WA 98104-1604
30 Tel: (206) 622-3150
31 Fax: (206) 757-7700
32 Email: laurenrainwater@dwt.com